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6	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
7			
8	ALLSTATE INSURANCE COMPANY; § ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY; ALLSTATE § CASE NO. 2:20-cv-00425-JCM-DJA		
9 10	INDEMNITY COMPANY; and ALLSTATE § FIRE & CASUALTY INSURANCE § COMPANY, §		
11	Plaintiffs, §		
12	VS. §		
13	OBTEEN N. NASSIRI, an individual; and \$ MED ED LABS, a Nevada nonprofit \$		
14	corporation, §		
15	Defendants. §		
16	CTIDULATION AND ODDED EVTENDING DDIEFING ON		
17	STIPULATION AND ORDER EXTENDING BRIEFING ON PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES [Doc. 76]		
18	(THIRD REQUEST)		
19	Pursuant to the Court's Minute Order in Chambers (filed Mar. 11, 2021) [Doc. 83], and		
20	by and through their respective counsel of record, Defendants OBTEEN N. NASSIRI ("Nassiri")		
21	and MED ED LABS ("MEL") (collectively "Defendants") and Plaintiffs ALLSTATE		
22			
23	INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE		
24	COMPANY, ALLSTATE INDEMNITY COMPANY, and ALLSTATE FIRE & CASUALTY		
25	INSURANCE COMPANY (collectively "Plaintiffs") hereby tender to the Court this Stipulation		
26	and Order Extending Briefing on Plaintiffs' Motion to Compel Discovery Responses [Doc 76]		
27			
28			

(*Third Request*). With this stipulation, Plaintiffs and Defendants (each a "Party" and collectively the "Parties") hereby stipulate and agree as follows:

- 1. The Parties are continuing in good faith to resolve a discovery dispute.
- 2. Defendants are continuing to work on supplementing their disclosures of documents and responses to Plaintiffs' requests for production to MEL.
- 3. On February 19, 2021, and February 25, 2021, Defendants supplemented their disclosures with more than 4,000 pages worth of documents. They also included an index of all documents produced by Defendants as of those dates and supplemented their responses to requests for production as well.
- 4. On or before March 17, 2021, Defendants will further supplement their disclosures and responses to requests for production with additional documents.
- 5. In order to accommodate Defendants in their making the forthcoming supplements identified above, to allow Plaintiffs to review such supplements, and to afford the Parties an opportunity to determine whether *Plaintiffs' Motion to Compel Discovery Responses (filed Feb. 10, 2021) [Doc. 76]* (the "Motion") is moot, the Parties have agreed to extend the briefing deadlines as follows:
 - a. The deadline for Defendants' response to the Motion shall be extended from <u>March 10, 2021 (old deadline)</u> to <u>March 19, 2021 (new deadline)</u>; and
 - b. The deadline for Plaintiffs' reply in support of their Motion shall be extended from <u>March 24, 2021 (old deadline)</u> to <u>April 2, 2021 (new deadline)</u>.

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1	III		
1	6. For excusable neglect in filing the	nis Stipulation after the March 10, 2021 deadline	
2	the Parties would show that they did not agree to the extensions until late that day		
3	Defendants were to prepare this Stipulation but because of their counsel's schedule an		
4	professional commitments, he was not able to do so until after that day and after the		
5		/ (C1 1) / 11 2021) [D 02]	
6	Court entered its Minute Order in Cham	bers (filed Mar. 11, 2021) [Doc. 83].	
7	IT IS SO STIPULATED.		
8	Dated: <i>March 12, 2021</i>	March 12, 2021	
9	FRIZELL LAW FIRM	FORAN GLENNON	
10	400 N. Stephanie St., Suite 265 Henderson, Nevada 89014	2200 Paseo Verde Parkway, Suite 280 Henderson, Nevada 89052	
11			
12	By: // R. Duane Frizell R. DUANE FRIZELL, ESQ.	By: <u>/s/ Lee H. Gorlín</u> DYLAN P. TODD, ESQ.	
13	Nevada Bar No. 9807	Nevada Bar No. 10456	
	Attorney for Defendants	LEE H. GORLIN, ESQ. Nevada Bar No. 13879	
14		Attorneys for Plaintiffs	
15	<u>ORDER</u>		
1.0		<u>DEK</u>	
16			
16 17	Having reviewed the foregoing Stipula	ation of the Parties, and finding good, just, and	
	Having reviewed the foregoing Stipula sufficient cause therefor, it is hereby entered as	ation of the Parties, and finding good, just, and	
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17 18 19	Having reviewed the foregoing Stipula sufficient cause therefor, it is hereby entered as	ation of the Parties, and finding good, just, and	
17 18	Having reviewed the foregoing Stipula sufficient cause therefor, it is hereby entered as IT IS SO ORDERED. DATED: March 15, 2021	ation of the Parties, and finding good, just, and an Order of the Court.	
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